



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

JMM:SK  
F. #2013R00948

*610 Federal Plaza  
Central Islip, New York 11722*

April 18, 2015

**By Email & ECF**

Richard D. Haley, Esq.  
One Suffolk Square  
1601 Veterans Memorial Highway  
Suite 425  
Islandia, NY 11749

Joseph Conway, Esq.  
LaRusso & Conway  
300 Old Country Road, Suite 341  
Mineola, NY 11501

---

Re: United States v. Philip Kenner & Tommy C. Constantine  
Criminal Docket No. 13-607 (JFB)

---

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on January 16, 2014, January 23, 2014, February 10, 2014, March 6, 2014, March 11, 2014, March 24, 2014, April 11, 2014, May 21, 2014, June 6, 2014, August 6, 2014, August 15, 2014, August 20, 2014, August 22, 2014, August 27, 2014, August 28, 2014, August 29, 2014, September 2, 2014, September 11, 2014, September 12, 2014, September 19, 2014, October 2, 2014, February 20, 2015, February 25, 2015, February 28, 2015, March 3, 2015, March 5, 2015, March 17, 2015, April 6, 2015, April 10, 2015 and April 14, 2015.

Enclosed please find records obtained from Vegas Marketing Promotions (VM 1-17) and Gilmartin, Magence & Ross LLP (LV 1623-1630). The government also provides written notice that it intends to offer certain business records via certifications pursuant to Federal Rule of Evidence 902(11): Vegas

Marketing Promotions (Apr. 16, 2015) (records: VM 2-17) and 1st Century Bank (Apr. 16, 2015) (records: BNK-1ST 1-520).

Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/Saritha Komatireddy  
Saritha Komatireddy  
James M. Miskiewicz  
Assistant U.S. Attorneys  
(631) 715-7825/7841

Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)